

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:

Case No. 23-bk-44014

**Carl Mongru,**

**DECLARATION OF MOJDEH MALEKAN, ESQ. IN SUPPORT OF SECURED  
CREDITOR'S MOTION TO DISMISS**

I, Mojdeh Malekan, declare as follows: I am an attorney of the Bar of this Court and associated with Hasbani & Light, P.C., counsel for the Secured Creditor Millennium Trust Company, LLC as Custodian FBO Prime Meridian NPL, LLC (the "Secured Creditor") in the above-captioned action. I am fully familiar with the facts set forth herein. I am not a party to this action. I submit this Declaration in Support of Plaintiff's Motion to Dismiss pursuant to 11 U.S.C. 1307(c), for an order:

- (a) Dismissing this action and deeming it a nullity pursuant to 11 U.S.C. 1307(c); and
- (b) granting such other and further relief to Plaintiff as this Court may deem just and proper.

1. A copy of the Judgment of Foreclosure and Sale granting in New York State Supreme Court, Kings County under Index No. 507014/2014 is annexed hereto as **Exhibit A**.

2. A Copy of the deed pursuant to which Carl Mongru transferred the subject property to G&Q Estates Corp. is annexed hereto as **Exhibit B**.

3. A copy of the Order dated August 31, 2023, granting Secured Creditor's motion to appoint a receiver of rents, is annexed hereto as **Exhibit C**.

Dated: New York, New York  
November 21, 2023

**HASBANI & LIGHT, P.C.**

/s/ Mojdeh Malekan

Mojdeh Malekan

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Trust Company, LLC as Custodian FBO

Prime Meridian NPL, LLC